

FILED - GR

October 17, 2019 11:46 AM

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

CLERK OF COURT
U. S. DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
BY: ns Scanned: JW /10-17-19

CLARENCE OTWORTH,

Plaintiff,

V.

TONY MOULATSIOTIS,
LISA SWANSON,
TAMMY STEPHENSON,
JESSICA KIDDER,
SHERYL MOSS,
DANA NESSELL
SAMANTHA REASNER,
GRETCHEN WHITMER,
MUSKEGON COUNTY
VILLAGE OF LAKEWOOD CLUB,
DALTON TOWNSHIP,

Defendants.

CASE NO. 1:19-CV-621

PAUL LEWIS MALONEY
United States District Judge

MAG. RAYMOND KENT RECUSED

MOTION FOR MONETARY SANCTION

NOW COMES the plaintiff Clarence Otworth pursuant to Rule 11(c) for violations of Rule 11(b) and moves this court to impose monetary sanctions of \$10,000 upon Allan C. Vander Laan (P33893) and the CMDA law firm for presenting pleading for the improper purpose of harassing the plaintiff, causing unnecessary delay, needlessly increasing the cost of litigation, frivolous arguments that have no evidentiary support, perjury if the court considers his numerous lies were told under oath, trying to change existing law, and denials of incontrovertible facts.

Plaintiff wrote Allan C. Vander Laan and said - PLEASE STOP WASTING MY TIME AND MONEY WITH YOUR STUPID LIES, BUT HE CONTIUED TO QUOTE THE FABRICATIONS OF PLUNKETT COONEY AND CLAIM THAT I SAID THEM.

WHEREFORE. Plaintiff's motion should be granted.

October 5, 2019



Clarence Otworth
187 East Daniels Road
Twin Lake, MI 49457
231) 292-1205

VERIFICATION

I, Clarence Otworth, declare under penalty of perjury that I have read the above, and that the matters stated therein are true to the best of my knowledge, information, and belief.

CERTIFICATE OF SERVICE

I, Clarence Otworth, state that I served the above by mailing a copy to Michigan's Department of Attorney General, at P.O. Box 30754, 525 West Ottawa Street, Lansing, MI 48909-8254, attorneys for Dana Nessel, Samantha Reasner, and Gretchen Whitmer.

And I mailed a copy to Plunkett Cooney, at 333 Bridge Street, NW, Ste. 530, Grand Rapids, MI 49504, Attorneys for Village of Lakewood Club and Lisa Swanson.

And I mailed a copy to CMDA, at 2851 Charlevoix Drive, SE, Ste.327, Grand Rapids, MI 49546, Attorneys for Muskegon County, Tony Moulatsiotis, and Sheryl Moss.

And I mailed a copy to Mika Meyers, at 900 Monroe Avenue, NW, Grand Rapids, MI, 49503, Attorneys for Dalton Township, Tammy Stephenson, and Jessica Kidder, on October 5, 2019.

CLARENCE OTWORTH
187 EAST DANIELS ROAD
TWIN LAKE, MI 49457
FRANK J. BURNS KILLED RFK

GRAND RAPIDS MI 494

15 OCT 2019 PM 6 L



CLERK OF THE COURT
UNITED STATES DISTRICT COURT
399 FEDERAL BUILDING
110 MICHIGAN STREET, NW
GRAND RAPIDS MI 49503

49503-231799



**CLARENCE OTWORTH
187 EAST DANIELS ROAD
TWIN LAKED, MI 49457
SECRET SERVICE KILLED JFK**